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SkyPilot Network, Inc is very much in support of the Advanced Antenna proposal (Discussion Point A.1). We believe it is beneficial for both equipment vendors and wireless operators to have a clarification of the Part 15 rules for directional antennas. We feel that it would be advantageous to also clarify the communications rules between the directional antenna systems. It is our understanding that all communications must be between just two nodes at any one time, with no other nodes decoding the transmitted data. The only exception to this rule being infrequent messages used to establish the node to node communications links (e.g. 802.11 beacon messages).

We are against the proposal for Flexible Equipment Authorization for Radio Transmission (Discussion Point A.3). There are many variables that affect amplifier performance and the ability to certify under Part 15. These include cabling, antenna gain and even mechanical packaging. These variables, combined with the high level of general technical complexity, mean that operators could very easily assemble a system operating outside Part 15 parameters. This would result in interference for other users of the spectrum.

In the case of the Improving Sharing in the Unlicensed Bands proposal (Discussion Point A.7), SkyPilot Network, Inc does not believe that enforcement of "spectrum etiquette" is required or beneficial. We strongly believe that any enforced rules would favor incumbents, stifle innovation and reduce the availability of new services. We believe that the currently enforced Part 15